

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

This document relates to:	)	
	)	
KATHLEEN ASHTON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
-against-	)	CONSOLIDATED CIVIL ACTION
	)	NO. 02 CV 6977
	)	Judge Richard C. Casey
AL-QAEDA ISLAMIC ARMY, et al.,	)	
	)	
Defendants.	)	
	)	

**DECLARATION OF WAEL HAMZAH JELAIDAN SECRETARY-GENERAL  
OF THE RABITA TRUST IN SUPPORT OF DEFENDANT RABITA TRUST'S  
MOTION TO DISMISS THE THIRD AMENDED CONSOLIDATED MASTER  
COMPLAINT**

IN THE NAME OF GOD, THE MERCIFUL, THE COMPASSIONATE, I Wael  
Hamzah Jelaidan, state as follows:

1. I am the Secretary-General of the Rabita Trust and I submit this  
declaration in my professional capacity as Secretary-General of Rabita Trust and in  
connection with the motion to dismiss the complaint against Rabita Trust as a named  
defendant in the above-referenced action. I make this affidavit based on my personal  
knowledge and the documents and records in my possession.

1. I hereby submit to the best of my knowledge that from 1992 to  
1994 Rabita Trust engaged in the construction of housing units for and the repatriation  
and rehabilitation of Pakistanis displaced in Bangladesh by the 1970 Indo-Pak War.

2. To the best of my knowledge, as a result of a change in government in

Pakistan in 1994, Rabita Trust was put in isolation, and all construction and repatriation activity ceased and there were no further annual board meetings.

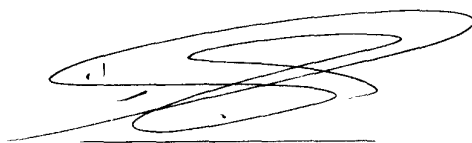
3. Rabita Trust has maintained and continues to maintain its own operations, payroll records and budgets, completely separate and apart from MWL, IIRO, Sanabel Al-Kheer, Makkah al-Mukarramah and Al-Watania Poultry.

4. Rabita Trust has been and remains responsible for its own capitalization and management of assets wholly separate and apart from MWL, IIRO, Sanabel Al-Kheer, Makkah al-Mukarramah and Al-Watania Poultry.

5. Rabita Trust maintains all corporate formalities separate and apart from MWL, IIRO, Sanabel Al-Kheer, Makkah al-Mukarramah and Al-Watania Poultry; the entities conduct separate board meetings and maintain separate minutes of such meetings; the entities maintain separate books, records, and financial accounts; the entities have separate headquarters, files and office space; and, any transactions between the entities are conducted on an 'arms length' basis and are recorded by appropriate entries in the books and records of the companies in accordance with generally recognized accounting principles.

6. Rabita Trust is not a subsidiary of MWL.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 17th day of May, 2004.



Wael Hamzah Jelaidan



For and on behalf of the undersigned,  
The undersigned has caused this document to be signed  
with a digital signature and a certificate  
Bassam A. Alim, Esq.  
Attorney at Law

